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Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU I/S/O
DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Courtroom: 8, 19th Floor
Judge: Hon. William H. Alsup

Filed/Lodged Concurrently with:

1. Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, Hong-An Vu, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Response to Waymo’s Supplemental Opposition to Otto Trucking’s Motion for Separate Trial [Dkt. 2056] and exhibits thereto (the “Administrative Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Exhibit 1 to Brun Declaration	Highlighted Portions	Waymo (Blue)

3. The highlighted portions of Exhibit 1 contains information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber Technologies, Inc., Ottomotto LLC (collectively, “Uber”) have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate.

4. Otto Trucking anticipates that Waymo and Uber will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of Otto Trucking’s Motion and its supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of October, 2017 in Los Angeles, California.

/s/ Hong-An Vu
HONG-AN VU

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 25, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 25, 2017**.

/s/ Hong-An Vu
HONG-AN VU